



510 Sixteenth Street • Suite 100 • Oakland CA 94612-1500 • <http://www.wid.org>

February 15, 2008

Honorable Kevin J. Martin  
FILING  
Chairman  
Federal Communication Commission  
445 12th Street, SW  
Washington DC 20334

ELECTRONIC

**Re: CC Docket No. 96-45 Petition of TracFone Wireless, Inc.  
For Designation as an Eligible Telecommunications Carrier**

Dear Chairman Martin and Commission:

On behalf of the World Institute on Disability (WID), I write to add our voice to those of other disability advocates (See letter of the American Association of People with Disabilities filed October 27, 2007) in support for designation of TracFone Wireless as an Eligible Telecommunications Carrier and urge speedy implementation of their Life-Line proposal.

WID is dedicated to strengthening the disability movement through research, training, advocacy and public education to help people with disabilities throughout the world enjoy increased opportunities to live independently. WID views access to telecommunications services as essential to living independently.

TracFone's Life-Line proposal offers a means to access twenty-first century communications capabilities for those who might not otherwise be able to afford it. People with disabilities are some of the most unemployed and underemployed in our country and often times live on very fixed incomes. Prepaid wireless service is sometimes the only option – either due to cost restraints, having little or no credit, or the desire to avoid complicated or lengthy contracts. These contracts, if misread or misunderstood, can accrue additional costs as a result of unexpected overage charges or late fees.

WID wholly support the principles of the Universal Service Fund and, specifically, the Life-Line and Link-Up programs that help ensure a measure of

connection to the public switched network for many consumers with disabilities and their families. We therefore support the availability of more eligible telecommunications carriers, such as TracFone Wireless -- who has sought ETC status for two years -- so that more persons with disabilities have the option to choose this form of wireless service. We also understand that the Commission has determined that TracFone Wireless' impact on the size of the fund -- should they become an ETC -- would be minimal.

There is little doubt that wireless phone service greatly benefits many persons with disabilities, including elderly persons, and their families. Where wireless service is often just a convenience or efficiency dynamic for persons without disabilities, in many cases, availability and use of wireless service is a significant factor in maintaining a life of independence and productivity for a person with disability.

WID believes that more availability of wireless services with Life-Line and Link-Up subsidies could be a facilitator to strengthening and lengthening independence in living for persons with disabilities. We strongly urge you to approve TracFone's petition for regulatory forbearance and ETC designation immediately.

Sincerely,

Kathy Martinez  
Executive Director